



Camille V. Otero  
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June 8, 2020

**VIA ECF**

Hon. James B. Clark, U.S.M.J.  
United States District Court  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07101

**Re: DVL, Inc. and DVL Kearny Holdings, LLC v. Congoleum Corporation and  
Bath Iron Works Corporation; U.S. District Court, District of New Jersey,  
Civil Action No. 2:17-cv-04261**

Dear Judge Clark:

This firm represents Congoleum Corporation ("Congoleum") in the above-referenced matter. We write jointly with plaintiffs DVL, Inc. and DVL Kearny Holdings, LLC, and defendant Bath Iron Works Corporation.

A telephonic status conference with Your Honor is presently scheduled for tomorrow June 9, 2020 at 11:00 a.m. The parties believe that no conference is necessary at this time and request that it be rescheduled. Rebuttal experts reports are being served today (June 8), as the deadline in the operative Scheduling Order (ECF 172) was April 24, 2020, which was extended by Standing Order 2020-09. The deadline for the completion of expert discovery was June 26, 2020, and the parties jointly request that the Court extend this deadline to Wednesday September 16, 2020, as the parties may need to complete approximately a dozen depositions over the summer. We believe this is the only deadline that needs to be set at this time, and the parties have no other matters requiring Your Honor's attention at this time. Of course, if Your Honor wishes to speak to the parties about the matter, we will be happy to continue with the conference tomorrow, as scheduled.

Thank you for your continuing attention to this matter.

Respectfully submitted,

A handwritten signature in black ink, reading "Camille V. Otero".

Camille V. Otero  
Director

cc: Counsel of Record